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Attorney for Defendant

United States District Court
Eastern District of Washington
Before the Hon. Salvador Mendoza, Jr.

United States of America,

Plaintiff, No. 4:19-CR-06063-SMJ

v.

Monica Pesina,

Defendant.

Motion to Expedite Hearing on
Defendant's Motion to Extend
Pretrial Motions Deadline

December 4, 2019 at 6:00 PM
Without oral argument

Defendant asks the court to expedite the hearing of Defendant's Motion to Extend the Pretrial Motions Deadline. This motion comes before the court pursuant to LR 7.1(h)(2)(C), which states:

...To seek an expedited hearing on a time sensitive matter, the moving party must file a motion to expedite which: 1) demonstrates good cause; 2) states the position of the opposing pro se party or counsel; and 3) sets a date of

1 hearing that is not less than 7 days after the motion's
2 filing.

3 Good cause exists to grant this motion to expedite because the
4 deadline to file pretrial motions is December 29, 2019 and if the
5 Court denies Defendant Pesina's motion to enlarge time after that
6 date, then she will have waived her right to file pretrial motions by
7 missing the deadline.

8 Defendant's counsel attempted to reach opposing counsel by
9 phone and email, but was unable to expeditiously reach her.

10 The date of hearing for this motion is seven or more days after
11 the motion's filing. Defendant's proposed order on Defendant's
12 Motion to Extend Pretrial Motions Deadline includes language
13 granting this motion to expedite and is incorporated with this filing
14 by reference.

15 Dated: November 27, 2019

Respectfully Submitted,

s/Adam R. Pechtel

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SERVICE CERTIFICATE

I certify that November 27, 2019, I electronically filed the foregoing with the District Court Clerk using the CM/ECF System, which will send notification of such filing to the following:

Stephanie Van Marter, Attorney for Plaintiff

s/Adam R. Pechtel
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